

EXHIBIT 11
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Attachment A

Assuming, for the sake of argument, that the “Sonos System” qualifies as prior art, when the asserted claims of the ’885 Patent are properly construed, in light of the specification, the level of ordinary skill of one in the art, and the state of technology at issue at the time of the alleged invention, Google’s current invalidity contentions fail to demonstrate that the “Sonos System” either anticipates or renders obvious the asserted claims of the ’885 Patent.

For instance, Google has failed to establish that the “Sonos System” anticipates or renders obvious at least the following limitations of the asserted claims of the ’885 Patent:

- [1.5]/[8.1] [while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players:]
 - at least because Google has failed to establish that the “Sonos System” embodied limitations [1.6]-[1.7]/[8.2]-[8.3] “while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players.”
- [1.6]/[8.2] [(i) receiving, from a network device over a data network, a first indication that the first zone player has been added to a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked]
 - at least because Google has failed to establish that the “Sonos System” embodied “a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked.”
- [1.7]/[8.3] [(ii) receiving, from the network device over the data network, a second indication that the first zone player has been added to a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player]
 - at least because Google has failed to establish that the “Sonos System” embodied “a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player.”

- [1.8]/[8.4] [after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation]
 - at least because Google has failed to establish that the “Sonos System” embodied “the first and second zone scenes” and “continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation.”
- [1.9]/[8.5] [after the given one of the first and second zone scenes has been selected for invocation, receiving, from the network device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players]
 - at least because Google has failed to establish that the “Sonos System” embodied “the first and second zone scenes,” “an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players,” and “receiving” such “instruction” “after the given one of the first and second zone scenes has been selected for invocation.”
- [1.10]/[8.6] [based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players]
 - at least because Google has failed to establish that the “Sonos System” embodied “the instruction,” and “transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players” “based on the instruction.”
- [2.1-2.2]/[9.1-9.2] [wherein the instruction to operate in accordance with the given one of the first and second zone scenes comprises an instruction to operate in accordance with the first zone scene, and wherein transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players comprises transitioning from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least